

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROSE UMANA

CRIMINAL NO. 1:14-CR-151

(Judge) Rambo

INDICTMENT

COUNT 1

(False Statements and Writings Relating to
Health Care Matters)

THE GRAND JURY CHARGES THAT:

Beginning in approximately January, 2010, and continuing through on or about January 14, 2014, in Cumberland County, Dauphin County, Perry County, and York County, within the Middle District of Pennsylvania and elsewhere, the defendant, **ROSE UMANA**, and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations and used materially false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries in connection with the delivery of and payment for health care benefits, items and services involving Medicaid, a health care benefit programs as defined in 18 U.S.C. § 24(b); to wit:

BACKGROUND

The defendant, **ROSE UMANA**, was the owner/operator of Vision Healthcare Services, Inc., ("Vision") a medical staffing company

and homecare services provider that is enrolled as a Medical Assistance provider since 2006. Medicaid is a joint federal-state program that provides health care coverage and nursing home coverage to certain categories of low asset individuals. As a Medical Assistance provider, Vision receives Medicaid compensation.

Healthcare providers in Pennsylvania, including **ROSE UMANA'S** company Vision, submit claims for reimbursement through the Provider Reimbursement and Operations Management Information System ("PROMISE"), a website operated by the Pennsylvania Department of Public Welfare. Claims are paid by the Pennsylvania Treasury Department.

Vision is physically located at 4113 Linglestown Road, Harrisburg, Pennsylvania, 17112.

FALSE STATEMENTS AND WRITINGS

The defendant, **ROSE UMANA**, either as a principal or as an aider and abettor, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations and used a material false writing and document including:

(1) Creating false identification documents including driver's license(s) and social security card(s) which were maintained in employee packets.

(2) Creating fictitious occupational licenses for workers who were not licensed or not licensed at the level represented

on the license; submitted bills to Medicaid for services purportedly provided by the fraudulently-represented health care provider; and thus received Medicaid compensation she was not entitled to receive.

(3) Billing Medicaid for services provided by someone other than the listed provider.

(4) Billing Medicaid for services not provided or provided by someone not qualified to render the services.

(5) Inflating the service time billed.

All in violation of Title 18, United States Code, Section 1035 (a)(2) and Section 2.

COUNTS 2 THROUGH 33

(Monetary Transactions Involving Criminally Derived Property)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in Count 1 of this Indictment are incorporated in Counts 2 through 33 as if fully set forth herein.

On the dates set forth below, in Cumberland County, Dauphin County, Perry County, and York County, within the Middle District of Pennsylvania and elsewhere, the defendant, **ROSE UMANA**, and others known and unknown to the Grand Jury, aided and abetted by each other, did knowingly engage or attempt to engage in monetary transactions involving criminally derived property of a value greater than \$10,000; to wit the defendant, **ROSE UMANA**, aided and abetted by individuals known and unknown to the Grand Jury engaged in monetary transactions, as set forth below, using proceeds obtained through the commission of false statements and writings involving a health care benefit program, a violation of 18 U.S.C. §1035 (a)(2).

COUNT	BANK WITHDRAW DATE	AMOUNT WITHDRAWN	TRANSACTION DESCRIPTION
2	9/27/2010	\$10,954	Ck#7355 VHS properties for 3 rd Qtr Rent
3	11/5/2010	\$20,000	Account 2433
4	11/16/2010	\$15,000	Ck#4492 Vision Healthcare; Ck#4499 Vision Healthcare Services, Inc. into Acct. 2433
5	12/13/2010	\$20,000	Ck# 4504 Vision Healthcare Services, Inc.
6	12/28/2010	\$15,000	Payroll; Wire Transfer to Stuart Harrison CGG, UK
7	12/29/2010	\$18,359.93	Electronic American Express Credit Card pay.
8	1/3/2011	\$13,900.08	Ck#7366 Connective Energy Supply dba Petron Oil Corp.
9	1/21/2011	\$50,000	Electronic American Express Credit card
10	4/11/2011	\$11,446.57	Payment
11	4/18/2011	\$25,000	Vision Healthcare Services
12	5/26/2011	\$16,637.14	Electronic American Express card payment
13	6/14/2011	\$20,000	Ck#4587 Rose Umana, Tax Sale

			Purchases
14	10/06/2011	\$50,000	Ck#4473, Metro Bank, LOC
15	10/20/2011	\$10,582.90	Payroll Service-Electronic Payment
16	10/27/2011	\$12,333.01	Payroll Service-Electronic Payment
17	11/03/2011	\$10,276.19	Payroll Service-Electronic Payment
18	11/9/2011	\$10,497.30	Payroll Service-Electronic Payment
19	11/14/2011	\$20,400	Wire Transfer to Ira Davidson
20	12/1/2011	\$11,560.36	Payroll Service-Electronic Payment
21	12/7/2011	\$45,000	Coldwell Banker
22	12/7/2011	\$10,954.56	Electronic American Express Card Payment
23	12/8/2011	\$10,303.66	Payroll Service-Electronic Payment
24	12/22/2011	\$12,036.54	Payroll Service-Electronic Payment
25	12/29/2011	\$15,584.19	Payroll Service-Electronic Payment
26	1/5/2012	\$10,803.35	Payroll Service-Electronic Payment
27	1/7/2012	\$10,509.84	Electronic American Express Credit Card Payment

28	1/12/2012	\$12,022.86	Payroll Service- Electronic Payment
29	7/18/2012	\$17,172.26	Payroll Service- Electronic Payment
30	9/19/2012	\$25,000	Ck#15443, VHS Properties
31	12/11/2012	\$112,000	Ck#15670, Rose Umana
32	12/17/2012	\$18,897.41	Electronic American Express Card Payment
33	12/24/2012	\$11,500	Ck#15660, Mohammad Zahid, VHS Vehicles
TOTAL		\$673,733.05	

All in violation of Title 18, United States Code, Section
1957 and Section 2.

COUNT 34
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in Count 1 of this Indictment are incorporated in Counts 2 through 34 as if fully set forth herein.

Beginning in approximately January, 2010, and continuing through on or about January 14, 2014, in Cumberland County, Dauphin County, Perry County, and York County, within the Middle District of Pennsylvania and elsewhere, the defendant, **ROSE UMANA**, and others known and unknown to the Grand Jury, aided and abetted by each other, did knowingly transfer, possess and use without lawful authority, a means of identification of another person in relation to false statements and writings involving a health care benefit program, in violation of 18 U.S.C. § 1035 (a) (2).

All in violation of Title 18, United States Code, Section 1028A (a) (1) and Section 2.

FORFEITURE ALLEGATION

THE GRAND JURY ALLEGES THAT:

In committing the felony offenses charged in Counts 1 through 33 of this Indictment, **ROSE UMANA**, derived the below described property which constituted or was derived from proceeds that **ROSE UMANA**, derived directly or indirectly as the result of the commission of such offenses, and the property listed below constitutes and is derived from property involved in the commission of such offenses, and constitutes substitute assets:

(1) \$177,704.32 seized from account ***933 held in the name of Vision Healthcare Services, Inc. at Belco Community Credit Union on January 14, 2014;

(2) \$12,775.85 seized from account ****-93141 in the name of Rose A. Umana and Isaac S. Udotong at Fulton Bank on January 14, 2014;

(3) \$30,983.85 seized from account *****433 in the name of Vision Healthcare Services, Inc. at Metro Bank on January 14, 2014; and

(4) \$85,998.27 seized from account *****971 in the name of VHS Money Market Acct at Metro Bank on January 14, 2014.

By virtue of the commission of the offenses charged in Counts 1 through 33 of this Indictment by **ROSE UMANA**, any and all right, title and interest the defendant may have had in the

above-described property is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 981 (a)(1)(C) and Section 982 and Title 21, United States Code, Section 853.

In the event that any of the property involved in the offenses alleged in Counts 1 through 33 or traceable to such property, or any other property constituting or derived from proceeds of such offenses, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty, the United States demands the forfeiture of other property of the defendants up to the value of the property listed above, pursuant to Title 21, United States Code, Section 853 (p).

A TRUE BILL



Grand Jury Foreperson

Peter J. Smith
PETER J. SMITH *by CRT*
United States Attorney

Dated: 6/18/14